

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**UNITED STATES OF AMERICA**

**v.**

**MICHAEL T. FLYNN,**

**Defendant**

**Crim. No. 17-232 (EGS)**

**NOTICE OF DISCOVERY CORRESPONDENCE**

The United States of America, by and through its attorney, the United States Attorney for the District of Columbia, hereby files with the Court its most recent discovery correspondence in this case. Earlier today, the government transmitted the attached letter to counsel (Attachment A), which states that this morning the government confirmed that it had misidentified the authorship of the handwritten notes from the January 24, 2017 interview of the defendant. The notes the government had previously identified as Peter Strzok's, are actually the other agent's notes (*see* Surreply, Exhibit 1), and what the government had identified as the other agent's notes are Strzok's notes (*see* Surreply, Exhibit 2).

We are available should the Court have questions, or if the Court would like us to take further corrective action.

Respectfully submitted,

JESSIE K. LIU  
U.S. Attorney for the District of Columbia

By: /s/\_\_\_\_\_

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Dated: November 5, 2019

**CERTIFICATE OF SERVICE**

I, Brandon L. Van Grack, certify that I caused to be served a copy of the foregoing by electronic means on counsel of record for the defendant on November 5, 2019.

/s/  
\_\_\_\_\_  
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*Attorney for the United States of America*

# ATTACHMENT A

*District of Columbia*

By: /s/  
 Brandon L. Van Grack  
*Special Assistant United States Attorney*  
 Jocelyn Ballantine  
*Assistant United States Attorney*